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The *Container Inspector*

The Container Inspection Training And Assistance Team Newsletter

Summer 2000

The Supervisor's Desk

LCDR Steven O'Malley
"Hail & Farewell at CITAT"

My time at CITAT has just about come to an end. This has been the most rewarding tour I have had in the Coast Guard. CITAT is a team and although leadership is important it was the individual contributions of each member that allowed us to ultimately triple the number of people trained each year. The same teamwork lead to CITAT: reaching out to provide increased support to Team Coast Guard in many ways from providing safety training to Cutter, Station and LE personnel to, explaining the strengths and weaknesses of the intermodal system to drug interdiction personnel. Our work with U.S. Customs grew exponentially under a CG/CS MOU and has resulted in an improved cooperative spirit between both agencies.

In the realm of National Security our work with the Department of Defense has grown dramatically. CITAT personnel provided assistance to the DOD in Korea and Guam during their "TURBO CAD" exercises last summer and CITAT has been added as permanent participants in future such operations. To prevent shipping problems, CITAT now travels to FT Campbell, KY to assist the Army in a large annual exercise.

Our partnership with industry has bloomed. Working together with the vessel operators we train the shippers that are actually packing the containers to prevent problems. This program reached over 400 shippers last year. In those areas where this partnership program has been in place we have seen the discrepancy rate fall by 5-6%. Since intermodal shipping is an international business our work with G-CI seemed a natural.



CITAT working with DoD in Ft. Campbell, KY

Over the past year we have sent teams to Panama (twice), Japan and we just concluded a trip to Jamaica.

On the human side, having the opportunity to travel to as many Coast Guard units as we have and meet so many of you out there was great. Each of us at CITAT has seen more of the Coast Guard and has developed more friendships within the organization than is normally ever possible.

I thank you all for the hospitality you extended to our team over these past three years.

Brief to the Commandant

LCDR Steve O'Malley

When the Commandant wants to obtain a first hand briefing on a specific program or project, the Captain responsible will be requested to provide an officer to conduct a briefing before a cabinet of flag officers at CG Headquarters.

On June 14th, CITAT was honored to represent the Coast Guard's intermodal container inspection program.



As you may have guessed, a "2 ½ minute Brief" takes a little longer than 150 seconds! The actual presentation is expected to be short and to the point, but the question and answer period can (and did) take considerably longer. I believe what makes our intermodal container inspection program so unique and interesting is that it truly is a "Team Coast Guard" and "ONE DOT" initiative.

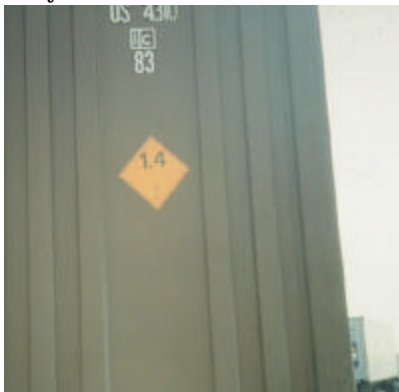
We at CITAT believe that we are in the unique position to serve four of the DOT's and Coast Guard goals (Safety, Economic Growth & Trade, Human/Natural Environment Protection and National Security). In addition, with 19 million containers traveling through U.S. ports last year and this number expected to double in less than ten years intermodal trade will impact many of the Coast Guard missions. To all of the CIP inspectors out there: your work has the attention of our senior leadership and the Department of Transportation! *Keep up the great work!*

Military Explosive Update

CWO Russ Canant

The U.S. Army has a new system that will be coming online soon for moving explosives in freight containers. The system is called "CROP," which stands for *Container Roll-in/Out Platform*.

Basically, the procedure involves pre-loading a rack (which is designed for munitions), then sliding the rack into a container. I think it will work out great and we should see this change take off into other directions as well. The DOD wants to move more supplies via containers and this type of technology is the key.



The core of CROP is the Container Handling Unit (CHU). It is a pre-manufactured tray that has limited capability of being altered for different cargoes. The CHU is slid into and out of the container. The CHU is

compatible for transportation on a flatbed truck. It is anticipated that the CHU can be loaded / unloaded in five minutes and can be converted in 15 minutes for travel between modes. Picture this, a freight container is delivered to a battery of cannons and is dropped off onto the ground. Any immediately available vehicle hooks on to the CHU inside the container and pulls it out. A soldier then walks up, picks up a round of ammunition and proceeds to load his artillery. At the end of the artillery barrage, the CHU is slide back into the container, the container is pulled back onto a flatbed truck and is ready for shipment by any mode.

There is still some resistance to this technology (especially by the infantry). Some people are afraid that containers of munitions may show up at the front lines and become targets for the enemy. The military has a plan. The munitions shipment will be unloaded at a safe distance from the actual combat line, which will still be a better, faster, safer way to move explosives. I predict that this technology will only get better and faster.

On a separate but related issue, we have also received several questions concerning the Net Explosive Weight (N.E.W.) limit on containers over 20 FT in length. 49 CFR 176.170 (b) states that containers over 20 FT in length **MAY NOT** contain more than 11,023 NEW pounds of explosives. It is perfectly legal for containers that are 20 FT or less to hold a higher amount of NEW up to the max gross weight of the container. The restriction on the longer containers is "as I was told by old timers" because the floor collapsed on some of the longer containers during the early days. Consequently, the U.S. Government restricted how many explosives could be carried. I am also told that this restriction may be going away because freight containers have improved in the last few years, but I haven't read anything official yet.

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2000 CIP / EHS Course

MSTC Ray Hillman

The National Container Inspection Program (CIP) and Explosive Handling Supervisor Course (EHS) will be held in Yorktown this year from September 11-22. As in the past, the course will cover 49 CFR, IMDG, explosives and radioactive Materials. We will also have breakout sessions with speakers from the FBI, Customs, and other DOT modes. The past two years the course has been held at Tinker AFB in Oklahoma City, yet due to renovations at Tinker, a new location for the course had to be found.

The new location will afford us the opportunity to have MSO Hampton Roads to host a one-day MASFO (Multi Agency Strike Force Operation) during the course. The students will apply what they have learned and hone their skills under live fire working in a multi-model environment.

For all that are coming to the course - remember to bring the most recent 49 CFR you can obtain and something to wear during the field training (e.g. work uniform or coveralls, hard hat, safety shoes, safety vest). The uniform of the day will be tropical blue long.

If you are interested in obtaining a slot, please contact G-MRP-3. The course number is **MS542**.

CITAT Personnel Changes

LT Dennis Branson

As with many units, CITAT will see some folks come and go this summer. LCDR O'Malley will be turning over the proverbial reigns to LCDR Gary Messmer. LCDR Messmer is completing a tour as Supervisor of MSD Panama City, FL (I'm sure he will find the Oklahoma [lake] beaches comparable!) LCDR O'Malley will be reporting to the Port Operations department at MSO Puget Sound.

CHECK OUT OUR WEBSITE (SOON TO BE IMPROVED AT: <http://tsi.dot.gov/DTI120>)

Also arriving (from MSO Wilmington, NC) will be LT Kimber Bannan. Ms. Bannan, a former teacher & Strike Team member, will surely be a great asset to the team.

After 20 years (10 day, & 32 hours - but who's counting!), DC1 Bob Bergen will be retiring. Bob, a CITAT Plank Owner, will be greatly missed as one of our fully qualified instructors and a shipmate who could always be counted on.
Good luck Bob!

CITAT Recognition

LT Dennis Branson

... "The Little Unit That Delivers the Biggest Bang for the Buck"...

That is the way CITAT has recently been characterized. On June 14th, LCDR O'Malley presented a "Two & Half Minute Brief" to the Commandant regarding CITAT and the container inspection program. G-MOC, our program manager, saw the brief as an outstanding opportunity to bring attention to the CIP program. All involved felt that the brief was very successful.

On June 1, CITAT received the Meritorious Unit Commendation (MUC) for outstanding service from August 1997 to December of 1999. A special thanks go out to the current and former CITAT members: DC1 Bergen, LT Branson, YN1 Chandler, CWO Canant, MST2 Ender, MSTC Gentile, MSTC Hillman, LCDR O'Malley, MST2 Willett & LT Willis who made the award possible. LCDR O'Malley received the Meritorious Service Medal (MSM) from ADM North for his work at CITAT over past three years.

Congratulations & Bravo Zulu!

"Who Has the Emergency Info? !!!"

MSTC Judy Halloran



You've got a vessel being unloaded at a pier when, during transfer to the facility, the bottom of a container breaks open allowing pallets, drums and assorted packages to pore out, breaking some open. People are injured and an ambulance is called. Someone, who ran through a cloud of powder, begins choking. Someone else starts choking and you realize something from the container is causing the problem.

What needs to be done to protect the injured, your crew and yourself? What about the ambulance crew? Is the product entering through the skin, inhalation, or is the material sublimating into a gas?

49 CFR 172.600 details the requirements for the emergency information to be available during transportation. Some of the information you need is required to be maintained by person's who offered for transportation, accept for stored hazardous materials during transportation (in other words the original shipper, the facility, the ship, and the terminal). These people are also required to have a 24-hour telephone number of a person or organization that is capable of providing product specific safety information. Generally this number is found on the shipping papers

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as specified in 49 CFR 172,202-203(k), and 49 CFR 172.600 or on the Dangerous Cargo Manifest (DCM) as specified in 49 CFR 176.30

The International Dangerous Goods Code (IMDG), Vol. I Sec. 9.10.2, also requires that appropriate emergency information should be immediately available at all times for use in incidents involving dangerous goods in transport. Methods of compliance include; entries on the dangerous goods declaration, a separate document (MSDS), or a volume like The Emergency Procedures for Ships Carrying Dangerous Goods in conjunction with the transport document.

In addition, DCMs on vessels calling U.S. ports are required to have the emergency response telephone number discussed previously in this article.

RSPA Interpretations

MST2 Lee Willett

Although I enjoy opening up the proverbial can of worms, I wish we had left the lid on this one....

...In the last few months, there has been focus on the shipment of propane to and from the Seattle and Anchorage as well as other points in Alaska. This all stems from an accident on board on the vessels that make a regular trip from Seattle to Alaska. It seems that a hybrid tank broke free from its frame and may have spilled up to 100 gallons of propane (the accident report, filed by the vessel, stated the amount spilled was unknown). What this incident brought to light was the MC 330/DOT 51-hybrid tank.

If the regulations are read verbatim, it is impossible to have a tank that is both a DOT 51 and an MC 330. A large number of these tanks have been identified in the Seattle to Alaska propane trade.

Both RSPA and CG headquarters are aware of the impact of suddenly removing these tanks from service and have worked with the National Propane Manufacturer's Association to minimize the disruption to service. Ten of these tanks have been granted a temporary (two round trip voyages) exemption from RSPA.

To simplify the CG position, unless an exemption exists, please use the following guidance:



Tanks that can be used to move propane in bulk (DESIGNATIONS WILL BE ON THE TANK DATA PLATE):

A) DOT-51 portable tank mounted on a skid. This skid must be secured to a flat rack or in a container by normal blocking and bracing (Chained down or secured in such a fashion to prevent movement). In this case the container or flat rack is not required to have a CSC Plate if the shipment is domestic but the container or flat rack must be in good repair. Use 33 CFR 160 to pull bad containers or flat racks out of domestic service if they have no CSC plate.

B) DOT-51 installed in its own container frame: This assemble must have a CSC plate on the container frame and a data plate on the tank. If the frame is damaged use 49 CFR 450-453 to take it out of service

C) Non-modified MC-330 (or 331) tank mounted on a truck or trailer chassis: This type is authorized for transport *ONLY* on board a trailership (e.g. roll on, roll off vessels), trainship, ferry vessel or car float in accordance with 49 CFR 176.76. A shipper could request an exemption from RSPA

if they wish to ship MCs on other types of vessels, but they would have to document why it is impractical to meet the regulations and why the alternative would provide safety at least equal to that afforded by meeting the regulations.

The following tanks are **not** authorized to move propane in bulk:

1) Motor Carrier (MC) 330 or 331 tanks that have been removed from a truck or truck chassis and secured by permanent (or temporary) means to a flat rack or in a container. The only exception to this is if the MCs have been legally converted into DOT-51 tanks and the flat rack, which forms the container, has a new/post conversion date stamp) CSC plate from a valid approval authority.

2) Any portable tank with both MC 330 or 331 & DOT-51 designations.

Remember, if you come across a portable tank that has a data plate that indicates it is an IMO type 5 or Type 6, you may want to keep looking to determine if the tank has been dual classed by both the IMO and US. Dual classing in this case is acceptable, but the tank must have the U.S. designation and accompanying data. As always, don't hesitate to call CITAT if you have any questions @ 405-954-8985

CITAT ADMIN

CWO Russ Canant



Supply money was tight this fiscal year consequently we were not able to buy adequate quantities of supplies like seals. However, we will be buying more supplies at the end of this year **when/if** fall-out money becomes available. Until then, we ask that you be more

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conservative with your high security seals. We ask that you save them for replacing only those very important seals like CUSTOMS or APHIS. I predict that things will get better.

I will be shifting jobs within CITAT soon. I am giving Administration and Finance over to LT. Dennis Branson. He volunteered (believe it or not) to take these burdens from me. I am moving to an area closer to my heart. I will be responsible for overhauling and making improvement to the quality and content of the course material.

I will be considering any ideas, suggestions, or comments that you in the field might have. The CITAT of today is not the CITAT of 1994. We have grown and expanded to whole new vistas.

HEADQUARTERS NEWS

LT Tom Sherman (G-MOC)

"CIP ODDS-N-ENDS"

"Inspection Quotas"...no such thing ! Seriously, here's a hint on how to improve on getting number of containers inspected: count your boxes examined during MASFOs.

Also, don't hesitate asking CITAT for techniques to increase your numbers (Editors note: Please See the article this issue on shipping papers).

As far as discrepancies and target enforcement areas, placarding and container structure discrepancies still lead the pack. Please look for ways to encourage compliance in these areas.

Statistics & Nationwide Database:

New quarterly reports by district with discrepancy rates... shows need for timely entry. There are some anomalies showing up in the database, so PLEASE be careful when you enter data and remember that it isn't perfect (i.e. "sailor proof"). On that note, if a container has discrepancies, DO NOT mark the "no

action” block. You must get them to come into compliance or write a violation. We need your effort to make this entry system as simple as possible.

Administration:

The CIP program is under G-MOC-1. (202) 267-6700. Please send requests for needed safety gear to me (LT Sherman) ASAP. All requests should be justifiable (no topsiders or "Leatherman" tools please!) and include price/source.

Encouraging Compliance with the Regulations

LCDR Steve O'Malley

Recently, a vessel operator requested that the Coast Guard notify intermodal shippers that the government does inspect cargo shipments that travel by water.

As the vessel operator explained the situation, they often lose customers to other vessel operators when they require the customers to follow the regulations. The customer has expressed that other vessel operators often do not require compliance with the regulations and believe that it is only a company policy that is getting in the way of their shipment.

To help educate these “wayward” shippers and help good operators defeat evil or misguided operators CITAT distributed a letter to the vessel operators that was addressed to the shippers of intermodal or hazardous cargoes.

Basically the letter states the Coast Guard does inspect shipments in accordance with 49 CFR. The vessel operators are free to reproduce the letter and distribute as they see fit. Please check our website for a copy of the letter.

About Shipping Papers

LCDR Steve O'Malley

"Do shippers have to have shipping papers when a container is sitting on a terminal?"



The answer is: No. According to the Research and Special Programs Administration (RSPA) in a letter of clarification: *"Once a container is unloaded from a vessel to a marine terminal and is awaiting subsequent transportation or devanning, there is no requirement other than an emergency response information"... "Using a dangerous goods list (DCM) to serve as the emergency response document is permissible when the dangerous goods list meets the requirements in 172.602"...*

Can a container leave a terminal without shipping papers?

No, an intermodal container can't legally travel off the terminal without shipping papers.

Does this situation impede our ability to promote the safe shipment of hazardous material? Actually, this situation dovetails nicely with LT Sherman's comments earlier about asking CITAT for techniques to increase your inspection numbers. In looking at the national database figures, the number one intermodal discrepancy is container structure, followed by improper shipping papers, placarding and blocking and bracing.

Let's attack the safety problems. Upon entering a terminal walk to a row of

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containers and examine the first fifty for structure only. (If you hit the whole terminal you would put it out of service.) While you are recording the defects you found your partner who is walking with you can be examining the dangerous goods list or terminal manifest to identify containers for opening.

Next, hit some hazardous material containers to check marking, labeling, placarding, packaging, stowage and segregation. Now let's take care of shipping papers and placarding. Since the trucks have to have the shipping papers as they exit or enter, stop them there. Just check shipping papers and placards for a couple hours.

A common misunderstanding that seems to exist is, if the Coast Guard inspects part of a shipment we have approved the whole shipment. As the inspector your job is to promote compliance using all the tools legally available to you (for example, detaining containers, educating shippers and or writing violation cases).

In the situation outlined above it is very possible that you may be inspecting three sets of containers for different concerns. You, the inspector, must document what was inspected and what was not inspected. Of course if you see an unsafe situation always take appropriate action.

The objective is to gain widespread compliance with all applicable regulations. An inspector that keys on only one aspect of the program does not improve or ensure public safety and the skewed inspection data will be apparent when the CIP database is reviewed.

SHIPPER OPTIONS

LCDR O'Malley

You found a container with a number of discrepancies and placed it on hold. Later that day the shipper makes the corrections and wants to have the container cleared for transportation.

Unfortunately, no Coast Guard personnel are available in the office and the container must be loaded within the next two hours or it will miss the sailing. One very acceptable



option we can offer the shipper is to have the container inspected by "other organizations or agencies authorized by the Coast Guard" for instance the National Cargo Bureau (NCB). These other agencies do charge for their expertise but the shipper may find the cost justifiable.

Note For a list of "other organizations" contact LT Sherman at 202-267-6700.

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Can we demand that the shipper use NCB or another agency? No, we can offer it as an option but we must be willing to provide the service in a reasonable period of time (should the shipper request so). A reasonable period of time should not be interpreted as a period of time so long as to force the use of "other organizations" but rather a period of time considering the unit's workload is possible.

